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DEC 16 2011

11-1243M

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
LONG ISLAND OFFICE

X

UNITED STATES OF AMERICA

SEALED COMPLAINT AND  
AFFIDAVIT

- against -

(T. 18, U.S.C., 846)

JONATHAN BOKUN and  
MICHAEL MANFREDI,  
also known as "Michael  
Munker,"

Defendants.

X

EASTERN DISTRICT OF NEW YORK, SS:

ANDREW BORRA, being duly sworn, deposes and states that he is a Special Agent with the Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between January 1, 2011 and December 15, 2011, within the Eastern District of New York and elsewhere, the defendants JONATHAN BOKUN and MICHAEL MANFREDI, also known as "Michael Munker", together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute more than 100 kilograms marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Section 846.)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. I am a Special Agent with Homeland Security Investigations ("HSI") and have been involved in the investigation of numerous narcotics cases. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the HSI investigative file and from reports of other law enforcement officials involved in the investigation.

2. On or about December 13, 2011, HSI agents in San Diego received information for a confidential source ("CS-1") who has proved to be reliable in the past. CS-1 told HSI agents that there was a drug trafficking organization, based in California, that was using multiple private planes to distribute large amounts of hydroponic marijuana throughout the United States. In particular, CS-1 described a Beech A36 plane, with tail number N367HP (the "Beech A36"), that was involved in this conspiracy.

3. On December 13, 2011, HSI agents learned from that the Beech A36 had requested weather information for a flight from Santa Rosa, California to Bloomington, Indiana. During that flight, the Beech A36 landed in Casper, Wyoming to refuel. HSI

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<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all of the relevant facts and circumstances of which I am aware.

Agents deployed a narcotic detector dog to the plane, which alerted to the presence of narcotic odor. Indeed, the agent could also smell a strong marijuana odor emanating from the vent of the Beech A36. The Beech A36 pilot subsequently returned to the plane. When confronted with the narcotic detector dog findings, the Beech A36 pilot admitted to engaging in a conspiracy to distribute marijuana and gave permission to search the plane. Although the final lab reports and weights are pending, more than 100 kilograms of marijuana were found.

4. The Beech A36 pilot also described how the conspiracy was sending another plane from Charles Schultz Airport in Sonoma County, California to Republic Airport in Suffolk County, New York on December 15, 2011. The Beech A36 pilot stated that this second plane was a Lear Falcon Twin Jet bearing tail number N404JW (the "Lear Falcon").

5. On December 15, 2011, HSI Agents began surveillance of the Lear Falcon, which was confirmed to be following the flight plan described by the Beech A36 pilot. HSI agents observed the Lear Falcon being loaded with several large containers from a Chevrolet Avalanche before takeoff.

6. On December 15, 2011, at approximately 5:11 in the evening, the Lear Falcon landed at Republic Airport. HSI agents observed the Lear Falcon taxi towards Atlantic Aviation, an area dedicated to servicing private planes. Once there, HSI agents

observed a female pilot (the "Lear Falcon pilot"), JONATHAN BOKUN and an unidentified male exited the Lear Falcon. MICHAEL MANFREDI pulled up to the Lear Falcon in a U-Haul Truck, Arizona plate number AE21510. HSI Agents then observed containers being unloaded and placed in the U-Haul truck by MANFREDI and BOKUN. Thereafter, defendants JONATHAN BOKUN and MICHAEL MANFREDI left in the U-Haul Truck.

7. HSI agents continued mobile surveillance of the U-Haul truck. Thereafter, New York state police stopped the U-Haul truck for a violation of New York State traffic law. Defendants JONATHAN BOKUN and MICHAEL MANFREDI were immediately detained, mirandized and questioned. A subsequent search warrant of the locked containers in the truck, pursuant to a court-ordered search warrant, revealed approximately 112.4 kilograms or 247.28 lbs. of marijuana.

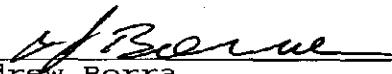
8. At approximately 7:20 in the evening, defendant MICHAEL MANFREDI waived his Miranda rights and agreed to make a statement. MANFREDI admitted that he was involved with defendant JONATHAN BOKUN in a conspiracy to distribute marijuana for more than a year. MANFREDI described how, on multiple occasions, he would help BOKUN to pick up "weed" from private planes.

9. Defendant MICHAEL MANFREDI also stated that the ten black containers in the U-Haul Truck were part of the same conspiracy. MANFREDI described being paid to rent the truck and

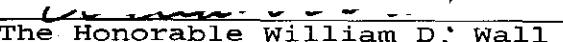
to drive JONATHAN BOKUN the narcotics to their safe house. MANFREDI described how, on a prior occasion, one of the containers had broken. At that time, JONATHAN BOKUN remarked that they both recognized the odor, which strongly smelled of marijuana.

10. Because the investigation is ongoing, there are additional unidentified co-conspirators and the safety of cooperating and confidential sources may be compromised by early disclosure, the government asks that this complaint be sealed.

WHEREFORE, your deponent respectfully requests that the defendants JONATHAN BOKUN and MICHAEL MANFREDI be dealt with according to law.

  
Andrew Borra  
Special Agent  
Homeland Security Investigations

Sworn to before me this  
16<sup>th</sup> day of December, 2011

  
The Honorable William D. Wall  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK